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## **EXHIBIT 17**

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# Transcript of Cristina Hoyos

**Date:** November 18, 2020

**Case:** Cellular Communications Equipment LLC -v- HMD Global Oy

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Transcript of Cristina Hoyos  
Conducted on November 18, 2020

1 (1 to 4)

1	3
1 UNITED STATES DISTRICT COURT	1 A P P E A R A N C E S
2 FOR THE EASTERN DISTRICT OF TEXAS	2 ON BEHALF OF THE PLAINTIFF:
3 MARSHALL DIVISION	3 HUNTER PALMER, ESQUIRE
4 - - - - - x	4 JERRY TICE II, ESQUIRE
5 CELLULAR COMMUNICATIONS :	5 BRAGALONE CONROY, PC
6 EQUIPMENT, LLC, :	6 2200 Ross Avenue
7 Plaintiff, : Civil Action	7 Suite 4500 W
8 v. : No. 2:20-CV-00078-JRG	8 Dallas, Texas 75201-7924
9 HMD GLOBAL OY, :	9 214-785-6670
10 Defendant. :	10
11 - - - - - x	11 ON BEHALF OF THE DEFENDANT:
12	12 JENNIFER KASH, ESQUIRE
13 Virtual Videotaped Deposition of	13 WARREN LEX, LLP
14 CRISTINA HOYOS	14 2261 Market Street NO. 606
15 Wednesday, November 18, 2020	15 San Francisco CA 94114
16 7:59 a.m. CST	16 415-895-2940
17	17
18	18 ALSO PRESENT:
19	19 Gen Silveroli
20 Job No.: 334658	20 Enrique Casas, Audiovisual Technician,
21 Pages: 1 - 36	21 Planet Depos
22 Reported by: THERESA A. VORKAPIC,	22
23 CSR, RMR, CRR, RPR	23
24	24
25	25
2	4
1 Virtual Videotaped deposition of Cristina	1 C O N T E N T S
2 Hoyos taken pursuant to subpoena before Theresa A.	2 EXAMINATION OF CRISTINA HOYOS PAGE
3 Vorkapic, a Certified Shorthand Reporter,	3 Examination By Mr. Palmer 5
4 Registered Merit Reporter, Certified Realtime	4
5 Reporter, Registered Professional Reporter and a	5 E X H I B I T S
6 Notary Public in and for the State of Illinois.	6 (Attached to transcript.)
7	7
8	8 HOYOS DEPOSITION EXHIBITS PAGE
9	9
10	10 Exhibit 1 Declaration 12
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12	12 Exhibit 3 HMD America 0045 23
13	13 Exhibit 4 HMD America 00106 27
14	14 Exhibit 5 Linked in Profile 30
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5 (17 to 20)

<p style="text-align: right;">17</p> <p>1 <b>Americas.</b></p> <p>2 Q You mentioned two customers, I believe</p> <p>3 Quality One Wireless and Verizon?</p> <p>4 <b>A Correct.</b></p> <p>5 Q What other customers do you oversee?</p> <p>6 <b>A I oversee all the customers that we sell</b></p> <p>7 <b>to the Americas region.</b></p> <p>8 Q What other customers does that include?</p> <p>9 <b>A Ingram Micro, Bright Star, Partel, Jeg &amp;</b></p> <p>10 <b>Sons --</b></p> <p>11 Q So I want to go down to No. 5 on the</p> <p>12 declaration. It's on the next page.</p> <p>13 Can you go ahead and read No. 5 for me</p> <p>14 when it gets up on the screen?</p> <p>15 <b>A Yes, absolutely. "Any documents</b></p> <p>16 <b>concerning HMD America's sales in the United</b></p> <p>17 <b>States are located in HMD America's office in</b></p> <p>18 <b>Miami."</b></p> <p>19 Q Can you explain what you mean by located</p> <p>20 in HMD America's offices?</p> <p>21 <b>A Yes, this one is a little bit deceiving.</b></p> <p>22 <b>I mean, our offices in Miami, there are documents</b></p> <p>23 <b>in my Miami office. As you can imagine in today's</b></p> <p>24 <b>technology, any documents that I will pull I will</b></p> <p>25 <b>pull from my the computer if I have the capability</b></p>	<p style="text-align: right;">19</p> <p>1 <b>are in physical form and what type of documents</b></p> <p>2 <b>are in just in electronic. That's what I'm</b></p> <p>3 <b>referring to.</b></p> <p>4 Q The electronic documents, are they stored</p> <p>5 on a server?</p> <p>6 MS. KASH: Objection to form.</p> <p>7 BY THE WITNESS:</p> <p>8 <b>A I cannot assure you. I'm not sure. I</b></p> <p>9 <b>suppose, but I'm sorry, I cannot say with</b></p> <p>10 <b>certainty that they are stored all on a server.</b></p> <p>11 <b>BY MR. PALMER:</b></p> <p>12 Q Do you know who would know that</p> <p>13 information?</p> <p>14 <b>A No, I don't. I mean, I will say somebody</b></p> <p>15 <b>from the IT department, but I don't know exactly</b></p> <p>16 <b>who that person will be.</b></p> <p>17 Q The physical copies like the mail and</p> <p>18 other things that you mentioned, are those</p> <p>19 documents uploaded electronically after you get</p> <p>20 them?</p> <p>21 <b>A No, no. There is nobody doing that today.</b></p> <p>22 Q Does HMD Global have access to these</p> <p>23 documents?</p> <p>24 MS. KASH: Objection to form.</p> <p>25 BY THE WITNESS:</p>
<p style="text-align: right;">18</p> <p>1 <b>of doing it or if I know how, but some other</b></p> <p>2 <b>documents are located in the office of Miami. We</b></p> <p>3 <b>get some tax information in the office of Miami.</b></p> <p>4 <b>Some HR documents gets to the office in Miami, so</b></p> <p>5 <b>that's what I'm referring to this.</b></p> <p>6 Q When you say the ones that are in the</p> <p>7 offices in Miami, do you mean those ones where</p> <p>8 there are physical copies located in those</p> <p>9 offices?</p> <p>10 <b>A Correct.</b></p> <p>11 Q You said some are accessed electronically.</p> <p>12 Are they also available via your computer?</p> <p>13 <b>A Some documents can be retrieved from the</b></p> <p>14 <b>computer, correct.</b></p> <p>15 Q Can you explain which documents are</p> <p>16 located where?</p> <p>17 MS. KASH: Objection to form.</p> <p>18 BY MR. PALMER:</p> <p>19 Q Which are physical versus which are</p> <p>20 electronic?</p> <p>21 <b>A I was just giving you an example of</b></p> <p>22 <b>sometimes some of the tax authorities across North</b></p> <p>23 <b>America they don't -- they're changing now, but</b></p> <p>24 <b>they send mail so that's what I'm referring to,</b></p> <p>25 <b>but I couldn't list exactly what type of documents</b></p>	<p style="text-align: right;">20</p> <p>1 <b>A Can you clarify to which documents?</b></p> <p>2 <b>BY MR. PALMER:</b></p> <p>3 Q All of them. We can go piece by piece.</p> <p>4 Does HMD Global have access to the</p> <p>5 physical ones?</p> <p>6 <b>A No because they are located in HMD</b></p> <p>7 <b>Americas, in the office of HMD Americas and nobody</b></p> <p>8 <b>is uploading them unless somebody from HMD Global</b></p> <p>9 <b>goes to the office in Miami.</b></p> <p>10 <b>Now, the electronic ones absolutely</b></p> <p>11 <b>because they are in someplace I imagine so they</b></p> <p>12 <b>would have access with the right credentials.</b></p> <p>13 Q Do you know how they access those? Is</p> <p>14 there a website or a location for those?</p> <p>15 <b>A I will only speak for myself if I have to</b></p> <p>16 <b>access a document I will do it through -- it</b></p> <p>17 <b>depends on the document, I will do it through my</b></p> <p>18 <b>computer through a -- depending on which</b></p> <p>19 <b>documents, I will use SAP or a sample, that's</b></p> <p>20 <b>basically it.</b></p> <p>21 Q So next I want to go into some of the</p> <p>22 sales documents that HMD has produced in this</p> <p>23 case.</p> <p>24 Enrique, can you please pull up Exhibit 2.</p> <p>25 MS. KASH: Object to form. When you say</p>

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9 (33 to 36)

<p style="text-align: right;">33</p> <p>1 Q Who participated in that meeting with you?</p> <p>2 <b>A Jen and Gen.</b></p> <p>3 Q So both of the attorneys on the call</p> <p>4 today?</p> <p>5 <b>A Correct.</b></p> <p>6 Q And you said there was a second meeting?</p> <p>7 <b>A Yes.</b></p> <p>8 Q Was that with anyone else?</p> <p>9 <b>A With Jen and gosh I forgot the other lady,</b></p> <p>10 <b>again, my apologies.</b></p> <p>11 Q Was that other lady an HMD employee?</p> <p>12 <b>A No.</b></p> <p>13 Q Were they an attorney?</p> <p>14 <b>A Yes and that call lasted about 40 minutes.</b></p> <p>15 Q Were both of those meetings calls?</p> <p>16 <b>A Correct.</b></p> <p>17 Q Did you review any documents to prepare</p> <p>18 for this deposition?</p> <p>19 MS. KASH: Objection to form. Hold on one</p> <p>20 second.</p> <p>21 I'm going to instruct the witness not to</p> <p>22 answer the content of any document. You can</p> <p>23 answer the question yes or no. Otherwise, it's</p> <p>24 attorney work product. You can answer yes or no</p> <p>25 if you reviewed documents.</p>	<p style="text-align: right;">35</p> <p>1 anything else we need to ask you from you today,</p> <p>2 Ms. Hoyos.</p> <p>3 THE WITNESS: Okay.</p> <p>4 MR. PALMER: I think we can go ahead and</p> <p>5 finish up the deposition.</p> <p>6 MS. KASH: I want to put one thing on the</p> <p>7 record.</p> <p>8 I just want to make clear, I think would I</p> <p>9 did earlier, but we didn't at the beginning</p> <p>10 announce who we were and who we represented. I</p> <p>11 wanted to be clear that Ms. Hoyos is appearing</p> <p>12 pursuant to a subpoena that was served on her in</p> <p>13 her role as a HMD America employee and I'm here</p> <p>14 representing both HMD Global and HMD America as</p> <p>15 well as the witness.</p> <p>16 (Deposition concluded at 8:42 a.m. CST.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">34</p> <p>1 BY THE WITNESS:</p> <p>2 <b>A Yes.</b></p> <p>3 <b>BY MR. PALMER:</b></p> <p>4 Q So in reviewing those documents, did you</p> <p>5 have to refer to any additional documents to</p> <p>6 refresh your memory?</p> <p>7 <b>A No.</b></p> <p>8 Q If that makes sense. Okay.</p> <p>9 Did you do anything else to prepare for</p> <p>10 this deposition?</p> <p>11 <b>A No.</b></p> <p>12 Q Outside of those meetings and calls we've</p> <p>13 discussed, have you discussed this deposition with</p> <p>14 anyone else?</p> <p>15 <b>A Just internally with my VP of sales.</b></p> <p>16 Q Who is that VP of sales?</p> <p>17 <b>A Maurizio Angelone.</b></p> <p>18 MR. PALMER: I think that's all the</p> <p>19 questions that I have for today.</p> <p>20 Jerry, was there anything else that you</p> <p>21 saw that we needed to ask here?</p> <p>22 MS. KASH: Let's take a break if you want</p> <p>23 to discuss that. Why don't we mute.</p> <p>24 (Discussion was had off the record.)</p> <p>25 MR. PALMER: I don't think there's</p>	<p style="text-align: right;">36</p> <p>1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC</p> <p>2</p> <p>3 I, Theresa A. Vorkapic, Certified</p> <p>4 Shorthand Reporter No. 084-2589, CSR, RMR, CRR,</p> <p>5 RPR, and a Notary Public in and for the County of</p> <p>6 Kane, State of Illinois, the officer before whom</p> <p>7 the foregoing deposition was taken, do hereby</p> <p>8 certify that the foregoing transcript is a true</p> <p>9 and correct record of the testimony given; that</p> <p>10 said testimony was taken by me and thereafter</p> <p>11 reduced to typewriting under my direction; that</p> <p>12 reading and signing was not requested; and that I</p> <p>13 am neither counsel for, related to, nor employed</p> <p>14 by any of the parties to this case and have no</p> <p>15 interest, financial or otherwise, in its outcome.</p> <p>16 IN WITNESS WHEREOF, I have hereunto set my</p> <p>17 hand and affixed my notarial seal this 23rd day of</p> <p>18 November, 2020.</p> <p>19 My commission expires November 6, 2023.</p> <p>20</p> <p>21 </p> <p>22 THERESA A. VORKAPIC</p> <p>23 NOTARY PUBLIC IN AND FOR ILLINOIS</p> <p>24</p> <p>25</p>